



PO Box 2781, Smithers, BC, Canada, V0J 2N0

Tel (250) 847-9693 • **Email** pat@northwestinstitute.ca • **Website** northwestinstitute.ca

March 21, 2023

The Honourable George Heyman

BC Minister of Environment and Climate Change Strategy

Via email: ENV.Minister@gov.bc.ca

Open letter: Allow public input on Enbridge's fracked gas pipeline extension application

Dear Minister Heyman,

We, the undersigned organizations, write to express our concern regarding the environmental implications and lack of public input on the decision-making process to extend the Westcoast Connector Gas Transmission (WCGT) pipeline certificate. Enbridge Inc.'s application to push the deadline to start building the pipeline for another five years, until November 2029, and the process for granting this extension deserves to be informed by the people and communities who will be impacted.

First approved in 2014 and already receiving a five-year extension in 2019, the WCGT pipeline would transport fracked gas from northeastern B.C. to a liquified natural gas (LNG) facility near Prince Rupert. It will cross over 700km of valuable and irreplaceable ecosystems, including the critical habitat of the woodland caribou - listed as a 'threatened' species under the federal *Species at Risk Act* - as well as hundreds of salmon-bearing streams in the Fraser and Skeena watersheds. It will cross the territories of several Indigenous nations and communities, many of whom have not provided consent to this project. We continue to witness, with Coastal GasLink, how a fracked gas pipeline can trample on Indigenous rights and accrue violation after violation of its environmental assessment permit.

The WCGT pipeline will have significant implications for the achievement of B.C.'s climate targets and our efforts to address climate change. The original project [assessment report](#) states that the construction of the pipeline will produce up to 2.5 million tonnes (Mt) of greenhouse gas (GHG) emissions while operations will add up to 4.4 Mt of GHGs annually. B.C. is already failing to meet our emissions targets and a project of this scale will put our climate goals even further out of reach.

The direct emissions from the project are only a fraction of its broader implications. The pipeline will facilitate further emissions by enabling expansion of the fracking industry in northeast B.C. and new LNG terminals on B.C.'s north coast. Fracking is already B.C.'s largest source of GHG emissions, yet we still don't know just how significant these emissions are given that B.C. [significantly undercounts methane](#).

What we do know is that LNG terminals are set to become the biggest point-source emitters of GHGs in B.C. Electrifying these facilities would reduce emissions but remains a pipe dream given that B.C. does [not have enough electricity](#) to do so. The Ksi Lisims LNG facility, which is undergoing environmental assessment and is considering using the WCGT pipeline, will either produce 1.9 Mt of GHGs a year or use up 5,000 GWh of electricity per year – the generating capacity of another Site C dam. There is no simple way around the GHG implications of these projects.

It gets worse. There will be massive emissions from the eventual combustion of the fracked gas that the WCGT pipeline helps make possible. The fracked gas that this pipeline can transport at full capacity (8.4 bcf/day) would produce about 162 Mt of GHGs a year, which is 2.5 times more than the entire province of B.C. emitted in 2020. B.C. should not become an exporter of climate catastrophe.

The project has had 10 years to make a start but has failed to do so. In this time, the world has changed drastically. The urgency of the climate crisis is now crystal clear, as people in B.C. bear the brunt of increasing forest fires, heat waves, and floods of unprecedented magnitude. As Premier Eby stated in his first speech as premier: "We cannot continue to expand fossil fuel infrastructure and hit our climate goals." The world is turning away from fossil fuels – including so-called "bridge fuels" like fracked gas – at an increasing pace. Further, we do not accept any more massive infrastructure projects that violate Indigenous rights and harm our lands.

Therefore, we request that you establish a public comment period for both decisions relevant to Enbridge's emergency extension application: 1) whether to vary the *Environmental Assessment Act* ("Act") to allow this extension to be considered and 2) whether to grant the extension.

As this is the project's second extension request, the Act must first be varied to allow an extension to be considered. The variance must be shown to be necessary due to an emergency and be in the public interest. A robust, informed decision on whether Enbridge was actually delayed due to an emergency and whether a variation is in the public interest can only be made by hearing from the public.

If a variation is granted, the public must also be consulted on whether or not to give Enbridge another five years to build its pipeline. We're sure that the public will have plenty to share on this subject.

In 2021, when the KSM Mine asked for emergency extension of its own, the B.C. Environmental Assessment Office held a public engagement process on both the variation decision and the extension decision. The reasons for both decisions referred to the information gathered from the public. The Minister's reasons [stated](#) that "I would expect the EAO...to follow a similarly rigorous process" for future emergency extension requests.

We are asking that you establish such a process now, starting with a public comment period for the variance decision.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. Moss". The letters are cursive and somewhat stylized.

Pat Moss
Executive Director

Babine River Foundation
Carrie Collingwood, Director

Canadian Association of Physicians for the Environment
Melissa Lem, President

Citizen's Oil & Gas Council
Mike Sawyer, Executive Director

Climate Justice Victoria
Eric Doherty, Director

Communities Against Supertankers
Valine Brown, Director

Council of Canadians, Campbell River
Richard Hagensen, Chairperson

Council of Canadians, Nelson/West Kootenay
Sandra Hartline

Council of Canadians, Terrace Chapter
Dave Shannon, Climate & Energy Chair

Council of Canadians, Victoria Chapter
Barbara Mitchell-Pollock, Co-chair

David Suzuki Foundation
John Young, Energy Transition Strategist & BC LNG Campaign Lead

Dogwood
Kai Nagata, Communications Director

Douglas Channel Watch
Cheryl Brown, Chair

Friends of Wild Salmon Coalition
Des Nobels, Past chair

Georgia Strait Alliance
Christianne Wilhelmson, Executive Director

Gidimt'en Checkpoint
Eve Saint, Divestment Financial Campaigner

Greenpeace
Keith Stewart, Senior Energy Strategist

Northwest Watch
Anne Hill, Chair

Shift Action for Pension Wealth and Planet Health
Patrick DeRochie, Senior Manager

SkeenaWild
Greg Knox, Executive Director

STAND Earth
Sven Biggs, Canadian Oil and Gas Program Director

T. Buck Suzuki Foundation
Alaina Pyde, North Coast Campaigner

West Coast Environmental Law
Gavin Smith, Staff Lawyer

Wilderness Committee
Peter McCartney

Cc: Premier Eby

